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February 15, 2013

BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Progeny LMS, LLC
Permitted Oral *Ex Parte* Presentation
WT Docket No. 11-49

Dear Ms. Dortch:

On February 13, 2013, representatives of Progeny LMS, LLC ("Progeny") met with Commission staff to discuss the independent and joint tests that were conducted to demonstrate Progeny's compliance with Section 90.353(d) of the Commission's rules. Participating in the meeting on behalf of the Commission were Geraldine Matise, Paul Murray, Paul D'Ari, Karen Ansari, and Hugh Van Tuyl. Participating in the meeting on behalf of Progeny were Rajendra Singh, Chairman of the Board for Progeny, Gary Parsons, CEO of Progeny, Ganesh Pattabiraman, President of Progeny, and the undersigned.

The Progeny representatives answered questions about the design and operation of Progeny's multilateration location and monitoring service ("M-LMS") network and the methods employed to avoid or mitigate potential interference to Part 15 devices. The substance of the discussion is detailed in the description of the Progeny network that Progeny filed with the Commission on January 27, 2012, and in Progeny's response to the comments that were filed on the joint test reports, dated January 11, 2013.

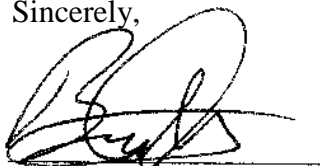
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Squire Sanders (US) LLP is part of the international legal practice Squire Sanders which operates worldwide through a number of separate legal entities.

Please visit squiresanders.com for more information.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", written over a horizontal line.

Bruce A. Olcott
Counsel to Progeny LMS, LLC